

## CIVIL COVER SHEET

6-Q-0001

This IS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Raymond Lerro

4561 Bermuda Street  
Philadelphia PA 19124(b) County of Residence of First Listed Plaintiff  
(EXCEPT IN U.S. PLAINTIFF CASES)

Philadelphia

(c) Attorneys (Firm Name, Address, and Telephone Number)

Holly C Dobrosky, Esquire  
100 S. Broad Street, Suite 1120  
Philadelphia PA 19110

215-880-7871

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only) 1 U.S. Government Plaintiff 3 Federal Question  
(U.S. Government Not a Party) 2 U.S. Government Defendant 4 Diversity  
(Indicate Citizenship of Parties in Item III)**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State

PTF

DEF

1

1

Incorporated or Principal Place of Business In This State

PTF

DEF

4

4

Citizen of Another State

2

2

Incorporated and Principal Place of Business In Another State

5

5

Citizen or Subject of a Foreign Country

3

3

Foreign Nation

6

6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<b>LABOR</b>	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<b>PERSONAL PROPERTY</b>	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 375 Death Penalty	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>OTHER:</b>	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 891 Agricultural Acts
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>HABEAS CORPUS:</b>	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 445 Amer. w/ Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 446 Amer. w/ Disabilities - Other	<b>OTHER:</b>	<input type="checkbox"/> 865 RSI (405(g))	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<b>FEDERAL TAX SUITS</b>	
		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
		<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>IMMIGRATION</b>	
			<input type="checkbox"/> 462 Naturalization Application	
			<input type="checkbox"/> 465 Other Immigration Actions	

**V. ORIGIN** (Place an "X" in One Box Only) 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 USC § 1983

Brief description of cause:

Raymond Lerro was falsely arrested.

**VII. REQUESTED IN COMPLAINT:** CHECK IF THIS IS A CLASS ACTION  
UNDER RULE 23, F.R.Cv.P.

DEMAND \$

In excess of \$250,000

CHECK YES only if demanded in complaint:  
 Yes  No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

N/A

JUDGE

DOCKET NUMBER

JAN - 1 2016

ST.

DATE 12/31/15

SIGNATURE OF ATTORNEY OF RECORD

Holly C Dobrosky

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFFP

JUDGE

MAG. JUDGE

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: Raymond Lerro - 4561 Bermuda Street, Philadelphia PA 19124

Address of Defendant: Robert Morrel - 4318 East 5th Street, Philadelphia PA 19124

Place of Accident, Incident or Transaction: January 1, 2014 on Aramingo Ave, Phila. PA  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes  No

Does this case involve multidistrict litigation possibilities?

Yes  No

RELATED CASE, IF ANY:

M/A

Judge \_\_\_\_\_

Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes  No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes  No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes  No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes  No

CIVIL: (Place ✓ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1.  Indemnity Contract, Marine Contract, and All Other Contracts
2.  FELA
3.  Jones Act-Personal Injury
4.  Antitrust
5.  Patent
6.  Labor-Management Relations
7.  Civil Rights
8.  Habeas Corpus
9.  Securities Act(s) Cases
10.  Social Security Review Cases
11.  All other Federal Question Cases  
(Please specify) \_\_\_\_\_

B. Diversity Jurisdiction Cases:

1.  Insurance Contract and Other Contracts
2.  Airplane Personal Injury
3.  Assault, Defamation
4.  Marine Personal Injury
5.  Motor Vehicle Personal Injury
6.  Other Personal Injury (Please specify) \_\_\_\_\_
7.  Products Liability
8.  Products Liability — Asbestos
9.  All other Diversity Cases

(Please specify) \_\_\_\_\_

I, Holly Dobrosky, Esquire, counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action-case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 12/31/15

ARBITRATION CERTIFICATION

(Check Appropriate Category)

Holly Dobrosky

Attorney-at-Law

65917

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

JAN - 1 2016

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 12/31/15

Holly Dobrosky

Attorney-at-Law

65917

Attorney I.D.#

**MSG**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Raymond Lerro

CIVIL ACTION

v.

Robert Morrel, et al

16 NO.

0001

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

12/31/15

Date

215-880-7871

A. Dobrosky

Attorney-at-law

215-750-1494

Raymond Lerro

Attorney for

ADobrosky@hotmail.com

Telephone

FAX Number

E-Mail Address

(Civ. 660) 10/02

2015 DEC 32 A 2:42

USDC-EDPA  
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CLERK'S OFFICE

JAN - 1 2016

(1)

FILED

JAN 01 2016

MICHAEL E. KUNZ, Clerk  
By RT Dep. Clerk

MSG  
**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RAYMOND LERRO	:	JURY TRIAL DEMANDED
4561 Bermuda Street	:	
Philadelphia, PA 19124,	:	
<i>Plaintiff,</i>		
v.		
ROBERT MORREL	:	
4318 East Stiles Street	:	
Philadelphia, PA 19124	:	
and		
HOLLY MORREL	:	
4318 East Stiles Street	:	
Philadelphia, PA 19124	:	
and		
TONY BELEN	:	
313 East Cornwall Lane	:	
Philadelphia, PA 19134	:	
and		
POLICE OFFICER CHARLES SQUARES #6422	:	
1515 Arch Street, 14th Floor	:	
Philadelphia, PA 19102	:	
and		
POLICE OFFICER ANDRE HUDGENS #7402	:	
1515 Arch Street, 14th Floor	:	
Philadelphia, PA 19102	:	
and		
POLICE OFFICER DAVID RICHARDSON #3580	:	
1515 Arch Street, 14th Floor	:	
Philadelphia, PA 19102	:	
and		
POLICE OFFICER AVILES #2955	:	
1515 Arch Street, 14th Floor	:	
Philadelphia, PA 19102	:	
and		
DETECTIVE JOHN HOPKINS #691	:	
1515 Arch Street, 14th Floor	:	
Philadelphia, PA 19102	:	
and		
DETECTIVE KEITH SCOTT #7603	:	
1515 Arch Street, 14th Floor	:	
Philadelphia, PA 19102	:	

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S

and	:
DETECTIVE JOSEPH MURRAY #7614	:
1515 Arch Street, 14th Floor	:
Philadelphia, PA 19102	:
and	:
DETECTIVE DENNIS ROSENBAUM #154	:
1515 Arch Street, 14th Floor	:
Philadelphia, PA 19102	:
and	:
SERGEANT JEROME MOORE #815	:
1515 Arch Street, 14th Floor	:
Philadelphia, PA 19102	:
and	:
THE CITY OF PHILADELPHIA	:
1515 Arch Street, 14th Floor	:
Philadelphia, PA 19102,	:
<i>Defendants.</i>	:

**COMPLAINT**

**PARTIES**

1. Plaintiff, Raymond Lerro is an adult individual who resides at 4561 Bermuda Street, Philadelphia County, Commonwealth of Pennsylvania.

2. Defendant, Robert Morrel is an adult individual who resides at 4318 East Stiles Street, Philadelphia County, Commonwealth of Pennsylvania.

3. Defendant, Holly Morrel is an adult individual who resides at 4318 East Stiles Street, Philadelphia County, Commonwealth of Pennsylvania.

4. Defendant, Tony Belen is an adult individual who resides at 313 East Cornwall Lane, Philadelphia County, Commonwealth of Pennsylvania.

5. Defendant, Police Officer Charles Squares is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

6. Defendant, Police Officer Andre Hudgens is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

7. Defendant, Police Officer David Richardson is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

8. Defendant, Police Officer Aviles is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

9. Defendant, Detective John Hopkins is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

10. Defendant, Detective Keith Scott is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

11. Defendant, Detective Joseph Murray is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the

City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

12. Defendant, Dennis Rosenbaum is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

13. Defendant, Sergeant Jerome Moore is, and was, at all times relevant to this Complaint, an employee of the Philadelphia Police Department, an employee of the City of Philadelphia, and acting under color of state law, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

14. Defendant, City of Philadelphia is a municipality of the Commonwealth of Pennsylvania and owns, operates, manages, directs and controls the Philadelphia Police Department which, at all times relevant hereto, employed defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore; said defendant maintains an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

15. At all times relevant hereto, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore were acting in the course and scope of their authority and employment as members of the Philadelphia Police Department with the City of Philadelphia.

16. At all times relevant hereto, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore were acting under color of state law and authority.

17. Defendants, Robert Morrel, Holly Morrel, Troy Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia are jointly and severally liable for the injuries and damages suffered by plaintiff, Raymond Lerro as fully set forth below.

#### **JURISDICTION**

18. Plaintiff, Raymond Lerro brings this action pursuant to 42 U.S.C. §§ 1983 and 1988 and the Fourth, Fifth, and Fourteenth Amendments of the United States Constitution. Jurisdiction is based upon 28 U.S.C. §§ 1331 and 1343 (1), (3) and (4) and the aforementioned statutory and Constitutional provisions.

19. Plaintiff, Raymond Lerro further invokes the supplemental jurisdiction of this Court to hear and decide claims arising under state law as they arise out of a common nucleus of operative facts. Venue is proper pursuant to 28 U.S.C. § 1331(b).

**FACTS**

20. On or about January 1, 2014 at approximately 11:58 p.m., plaintiff, Raymond Lerro was lawfully in the area of Philadelphia near Richmond Street, Orthodox Street, Lefever Street, Aramingo Avenue, Margaret Street, Richmond Street, and Bermuda Street.

21. On the aforesaid date, time, and location, plaintiff, Raymond Lerro was on his way from work to his home located at 4561 Bermuda Street in Philadelphia when he came into contact with, and was involved in an incident with defendants, Robert Morrel, Holly Morrel, and Tony Belen.

22. During the incident, the vehicle operated by defendant, Robert Morrell, and in which defendants, Holly Morrel and Tony Belen were passengers, collided with the vehicle operated by plaintiff, Raymond Lerro.

23. Plaintiff, Raymond Lerro did nothing to cause, provoke, and/or or otherwise instigate the aforesaid incident.

24. To the contrary, the aforesaid incident was caused, provoked, and/or instigated by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

25. During the aforesaid incident, plaintiff, Raymond Lerro was the victim of an assault and battery committed by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

26. After the aforesaid incident, in an effort to cover up their own wrongful conduct, defendants, Robert Morrel, Holly Morrel, and Tony Belen erroneously reported to various members of the Philadelphia Police Department that plaintiff, Raymond Lerro engaged in inappropriate, even criminal conduct towards them in that, on the aforesaid

date, time, and location, he operated his vehicle in a careless and/or reckless manner, operated his vehicle to intentionally frighten them, operated his vehicle at an excessive rate of speed, operated his vehicle while failing to obey any and all traffic control devices in his path, repeatedly pursued their vehicle for no apparent reason, repeatedly pursued other random vehicles for no apparent reason, repeatedly attempted to strike their vehicle by driving forward as well as in reverse, repeatedly attempted to strike other random vehicles by driving forward as well as in reverse, operated his vehicle both forwards and backwards to repeatedly follow and pursue their vehicle, pursued their vehicle by performing numerous U-turns, turning complete circles, crossing over medians, barriers, and islands, pursued their vehicle by repeatedly circling various and numerous street blocks to follow them, pursued their vehicle by operating his vehicle on the pavement, pursued their vehicle by operating his vehicle in the wrong direction on a one-way street, pursued their vehicle in reverse at an excessive speed intentionally causing the rear of his vehicle to collide with the front of their vehicle, then traveling in one direction on a street, jumping over a concrete island, and then traveling on that same street but in a different direction to maintain contact with them, then pointing a handgun out the window of his vehicle and intentionally firing a gun multiple times at defendants, Robert Morrel, Holly Morrel, and Tony Belen.

27. Subsequently, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and/or Sergeant Jerome Moore all conducted some portion of the investigation into the aforesaid alleged incident as reported by defendants, Robert Morrel, Holly Morrel, and

Troy Belen by conducting various law enforcement tasks such as interviewing and taking statements of the aforesaid defendants, searching for any independent witnesses to the alleged incident, visiting the scene of the alleged incident, photographing the scene of the alleged incident, searching the scene of the alleged incident for any evidence that supports the alleged victims assertion that the alleged incident actually occurred, photographing the scene of the alleged incident, identifying and interviewing and/or attempting to interview and identify any and all independent witnesses to the alleged incident, locating, obtaining, and viewing video surveillance footage which captured portions of the alleged incident, conducting a search of the plaintiff's person for a handgun when they searched for and encountered him shortly after the aforesaid incident, conducting a visual examination of the outside of the vehicle which plaintiff operated during the alleged incident, photographing the outside of the vehicle, conducting a search of the inside of the vehicle which plaintiff operated during the alleged incident, photographing the inside of the vehicle, conducting a search of the residence where plaintiff returned to after the alleged incident, photographing the search of the residence, and otherwise purportedly conducting all tasks necessary to ensure that they had a reasonable basis to arrest plaintiff and charge him with various criminal offenses which he allegedly committed against defendants, Robert Morrel, Holly Morrel, and Tony Belen.

28. During the aforesaid investigation, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore did not locate any ballistic evidence at the scene which supported the erroneous assertion by the alleged victims,

defendants, Robert Morrel, Holly Morrel, and Troy Bolden that the alleged incident actually occurred.

29. During the aforesaid investigation, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore did not locate physical evidence on plaintiff's person, from inside the plaintiff's vehicle, and/or from inside the plaintiff's residence, which supported the erroneous assertion by the alleged victims, defendants, Robert Morrel, Holly Morrel, and Troy Bolden that the alleged incident actually occurred.

30. During the aforesaid investigation, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and/or Sergeant Jerome Moore did not locate any independent eye-witnesses to the alleged incident which corroborated the version of events as presented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

31. Moreover, during the aforesaid investigation, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and/or Sergeant Jerome Moore reviewed video surveillance footage of the aforesaid date, time, and location which CONTRADICTED the version of events as presented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

32. Notwithstanding the aforesaid, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore concluded that there was sufficient evidence to arrest and charge plaintiff, Raymond Lerro with the following charges: Aggravated Assault, Carrying Firearms Without a License, Carrying Firearms in Public, Possession of an Instrument of Crime, Simple Assault, Recklessly Endangering Another Person, Criminal Mischief by Tampering with Property, and Criminal Mischief.

33. Notwithstanding the aforesaid, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore acted and/or failed to act in such a manner that plaintiff, Raymond Lerro was wrongfully charged with the following offenses: Aggravated Assault, Carrying Firearms Without a License, Carrying Firearms in Public, Possession of an Instrument of Crime, Simple Assault, Recklessly Endangering Another Person, Criminal Mischief by Tampering with Property, and Criminal Mischief.

34. Defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore failed to conduct an adequate and/or proper investigation into the incident alleged to have occurred by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

35. The investigation conducted into the incident alleged to have occurred by defendants, Robert Morrel, Holly Morrel, and Tony Belen by defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore was inadequate, incomplete, and insufficient to support a finding that the defendants, Robert Morrel, Holly Morrel, and Tony Belen provided to law enforcement a truthful version of their contact with plaintiff, Raymond Lerro on the date, time, and location aforesaid, such that their allegations supported the arrest, prosecution, and imprisonment of plaintiff, Raymond Lerro as stated above.

36. The results/findings of the investigation conducted into the incident alleged to have occurred by defendants, Robert Morrel, Holly Morrel, and Tony Belen by defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore did not provide a sufficient basis and/or justification for any finding by law enforcement that plaintiff, Raymond Lerro acted in the manner as represented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

37. The results/findings of the investigation conducted into the incident alleged to have occurred by defendants, Robert Morrel, Holly Morrel, and Tony Belen by defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore did

not provide a sufficient basis and/or justification for any finding by law enforcement that the defendants, Robert Morrel, Holly Morrel, and Tony Belen provided to them a truthful accounting of their contact with plaintiff, Raymond Lerro on the date, time, and location aforesaid.

38. The results/findings of the investigation conducted into the incident alleged to have occurred by defendants, Robert Morrel, Holly Morrel, and Tony Belen by defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore did not provide a sufficient basis and/or justification for any finding by law enforcement that plaintiff, Raymond Lerro acted in the manner as represented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen, such that he should be arrested and charged as stated above.

39. None of the defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore recovered any physical evidence at the scene which supported the version of events as presented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

40. None of the defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore recovered any physical evidence from inside of the plaintiff's

vehicle which supported the version of events as presented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

41. None of the defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore recovered any physical evidence from inside the plaintiff's residence which supported the version of events as presented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

42. None of the defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore identified, interviewed, and gleaned any information from independent eye-witnesses who provided incriminating evidence against the plaintiff which corroborated the version of events as presented to them by defendants, Robert Morrel, Holly Morrel, and Tony Belen.

43. Subsequently, notwithstanding that there was no probable cause to place plaintiff, Raymond Lerro under arrest, defendants, Robert Morrel, Holly Morrel, Tony Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore caused him to be arrested, prosecuted, and imprisoned as stated above.

44. The aforesaid charges were based upon the filing of a fraudulent and/or baseless police report by defendants, Robert Morrel, Holly Morrel, and Tony Belen,

Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore.

45. The actions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore violated plaintiff, Raymond Lerro's constitutional rights.

46. The actions of defendants, Robert Morrel, Holly Morrel, and Tony Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore were shocking to the conscious, reckless, and deliberately indifferent to the rights of plaintiff, Raymond Lerro and caused him to be wrongfully arrested, prosecuted, and imprisoned.

47. The actions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore violated plaintiff, Raymond Lerro's constitutional rights.

48. As a direct and proximate result of the conduct of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, plaintiff, Raymond Lerro was wrongfully arrested, prosecuted, and imprisoned.

49. Also as a result of the aforesaid, plaintiff, Raymond Lerro was falsely imprisoned for 16 days.

50. Also as a result of the aforesaid, plaintiff, Raymond Lerro was forced to expend monies to secure his release on bail.

51. Also as a result of the aforesaid, plaintiff, Raymond Lerro was forced to expend monies to retain various lawyers to represent him in the prosecution as stated above.

52. Also as a result of the aforesaid, plaintiff, Raymond Lerro lost his driver's license.

53. Also as a result of the aforesaid, plaintiff, Raymond Lerro was deprived of his ability to travel about freely.

54. Also as result of the aforesaid, plaintiff, Raymond Lerro was unable to perform a job which he was contractually obligated to perform and lost income as a result.

55. Also as a result of the aforesaid, plaintiff, Raymond Lerro sustained severe and debilitating injuries, including but not limited to head pain, blunt head trauma, headaches, dizziness, neck pain, neck pain which radiated down his left arm, back pain, back pain which caused a burning pain which radiated down his right leg and into the toes on his right foot, a laceration to his right finger, right finger pain, pain to the left side of his body, left flank pain, kidney pain, blood in his urine, overall body pain and aches, diminished ability to ambulate as he could prior to the incident, decreased mobility, decreased range of motion, and difficult sleeping.

56. As a result of the injuries aforesaid, plaintiff, Raymond Lerro has been and probably will in the future be obliged to spend large and various sums of money for medicine and medical attention in endeavoring to treat and cure himself of injuries sustained.

57. As a further result of the aforesaid, plaintiff, Raymond Lerro has suffered and will continue to suffer great mental anguish, physical pain, depression, nervousness, humiliation, personality change and a loss of natural enjoyment of life and life's pleasures.

58. As a further result of the aforesaid, plaintiff, Raymond Lerro has and may in the future be hindered and prevented from attending to his daily duties and occupation, to his great detriment and loss.

59. As a result of the conduct of defendants, plaintiff, Raymond Lerro was forced to retain the services of counsel and incur legal costs and to appear in court on a number of occasions in connection with the defense of false and fraudulent criminal charges lodged against him.

60. At no time relevant hereto did plaintiff, Raymond Lerro violate any laws or engage in any criminal behavior to justify the actions taken against him by any of the defendants as stated above.

61. At no time relevant hereto could or did defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore reasonably believe that their conduct toward plaintiff, Raymond Lerro was lawful, privileged, or otherwise permissible

under the laws or Constitutions of the United States and the Commonwealth of Pennsylvania, or that the laws regarding the rights of citizens such as plaintiff was in any way unsettled.

62. The actions and/or inaction of defendants, Robert Morrel, Holly Morrel, Troy Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, were committed deliberately, intentionally, maliciously, outrageously, willfully, wantonly, and constitute conduct so egregious as to shock the conscience.

63. Defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore engaged in the aforesaid conduct for the purpose of violating plaintiff, Raymond Lerro's constitutional rights by causing him to be falsely arrested and prosecuted and falsely imprisoned.

64. Defendant, City of Philadelphia knew or should have known of the constitutional deprivations committed by defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore through the administration of the general policies and practices within the Philadelphia Police Department. Furthermore, defendant, City of Philadelphia neglected and refused to enforce existing law or systematically mal-administered the law.

65. Defendant, City of Philadelphia, acting by and through its agents, servants, and/or employees, was also in violation of the law for failing to reprimand and/or discharge or otherwise discipline police officers found to have engaged in this activity, failing to warn police officers to this type of conduct, failing to formally promulgate and disseminate and train police officers with appropriate and reasonable guidelines for the use of offensive conduct by Philadelphia police officers and is directly liable and responsible for the acts of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore.

66. Defendant, City of Philadelphia is liable for the acts of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore because the City of Philadelphia, as a matter of policy and practice, has with deliberate indifference, tolerated and permitted the pattern of deprivation of constitutional rights by its police officers, failed to maintain a proper system for review, and failed to properly sanction or discipline police officers, including the defendants in this case, for violations of the constitutional rights of citizens, with the result that police officers from the City of Philadelphia were encouraged to believe that they could violate the rights of persons such as plaintiff with impunity.

67. The actions and omissions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles,

Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore deprived plaintiff, Raymond Lerro of his precious rights, privileges and immunities secured unto him by the Fourth and Fourteenth Amendments to the United States Constitution, in violation of 42 U.S.C. § 1983; in particular, the right to be free from wrongful arrest and unlawful imprisonment.

68. Defendant, City of Philadelphia, as a matter of policy and practice, has with deliberate indifference failed to reprimand, sanction or discipline members of the Philadelphia Police Department, including defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, and is aware of and subsequently conceal violations of the constitutional rights of citizens by its members, thereby causing and encouraging police, including defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, to engage in unlawful conduct.

69. As a direct and proximate result of the unwarranted, illegal, and unconstitutional actions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, plaintiff, Raymond Lerro was unlawfully arrested, prosecuted, and imprisoned, and suffered the damages as stated above.

70. The damages suffered by plaintiff, Raymond Lerro was the direct and proximate result of the conduct of all defendants, jointly, severally, directly or vicariously.

**COUNT I**  
**PLAINTIFF, RAYMOND LERRO V. DEFENDANTS**  
**CIVIL RIGHTS VIOLATIONS**

71. The allegations set forth in preceding paragraphs, inclusive, are incorporated herein as though fully set forth.

72. As a direct and proximate result of the actions and omissions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, plaintiff, Raymond Lerro was deprived of precious rights, privileges, and immunities secured unto him by the laws and Constitution of the United States.

73. Defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, together and/or with others, conspired to violate and/or did violate the constitutional rights of plaintiff, Raymond Lerro.

74. The actions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore, deprived plaintiff, Raymond Lerro of the equal protection of the laws and their rights, privileges and immunities under the laws and the Constitution of

the United States, in particular, the Fourth, Fifth, and Fourteenth Amendments thereof and in violation of 42 U.S.C. § 1983; to be secure in his person and property, his right to be free from the unlawful detention, to be secure in his person and property, to be free from unlawful seizure of his person and from false arrest, and to due process of law, all to plaintiff, Raymond Lerro's great detriment and loss.

75. By these actions, defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore deprived plaintiff, Raymond Lerro of the rights secured unto him by the Constitution of the United States, in particular, the Fourth, Fifth, and Fourteenth Amendments thereof and in violation of 42 U.S.C. § 1983.

76. The aforesaid conduct of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, and Sergeant Jerome Moore conduct was committed alone, together, and in conspiracy with one another.

**WHEREFORE**, plaintiff, Raymond Lerro demands judgment against defendants, Robert Morrel, Holly Morrel, and Tony Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, jointly and severally, in an amount in excess of two hundred and fifty thousand (\$250,000.00)

dollars, plus interest, costs, punitive damages, attorneys' fees and such other and further relief as this Honorable Court deems appropriate.

**COUNT II**  
**PLAINTIFF, RAYMOND LERRO V. DEFENDANTS**  
**ASSAULT AND BATTERY**

77. The allegations set forth in preceding paragraphs, inclusive, are incorporated herein as though fully set forth.

78. As a direct and proximate result of the actions and omissions of defendants, Robert Morrel, Holly Morrel, and Troy Belen, plaintiff, Raymond Lerro was placed in fear of imminent offensive and unpermitted touching and intrusions upon his person.

79. As a direct and proximate result of the actions and omissions of defendants, Robert Morrel, Holly Morrel, and Troy Belen, plaintiff, Raymond Lerro suffered offensive and unpermitted touching and intrusions upon his person.

80. The actions and omissions of defendants, Robert Morrel, Holly Morrel, and Troy Belen were done purposefully with the intent of committing assault and battery and/or were done in reckless disregard of the probability of causing plaintiff, Raymond Lerro to suffer an assault and battery and these actions did in fact result in an assault and battery, all to his great detriment and loss.

**WHEREFORE**, plaintiff, Raymond Lerro demands judgment against defendants, Robert Morrel, Holly Morrel, and Tony Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, jointly and

severally, in an amount in excess of two hundred and fifty thousand (\$250,000.00) dollars, plus interest, costs, punitive damages, attorneys' fees and such other and further relief as this Honorable Court deems appropriate.

**COUNT III**  
**PLAINTIFF, RAYMOND LERRO V. DEFENDANTS**  
**MALICIOUS PROSECUTION AND**  
**MALICIOUS ABUSE OF PROCESS OF LAW**

81. The allegations set forth in preceding paragraphs, inclusive, are incorporated herein as through fully set forth.

82. Defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, acting as agents and on behalf of defendant, City of Philadelphia, within the scope of their employment, wrongfully, unlawfully and maliciously prosecuted plaintiff, Raymond Lerro by issuing a complaint which charged him with false and fictitious crimes as stated above.

83. The actions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, as alleged in the preceding paragraphs, were done purposefully with the intent of committing malicious prosecution and malicious abuse of process of law, or were done in reckless disregard of the probability of causing malicious prosecution and malicious abuse of process of law, and these actions

did in fact result in malicious prosecution and malicious abuse of process of law, all to plaintiff's great detriment and loss.

**WHEREFORE**, plaintiff, Raymond Lerro demands judgment against defendants, Robert Morrel, Holly Morrel, and Tony Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, jointly and severally, in an amount in excess of two hundred and fifty thousand (\$250,000.00) dollars, plus interest, costs, punitive damages, attorneys' fees and such other and further relief as this Honorable Court deems appropriate.

**COUNT IV**  
**PLAINTIFF, RAYMOND LERRO V. DEFENDANTS**  
**FALSE ARREST AND FALSE IMPRISONMENT**

84. The allegations set forth in preceding paragraphs, inclusive, are incorporated herein as through fully set forth.

85. Defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, acting as agents and on behalf of defendant, City of Philadelphia, arrested plaintiff, Raymond Lerro without probable cause, caused criminal proceedings to be commenced and continued against plaintiff with malice and without probable cause, as a result thereof plaintiff was falsely imprisoned.

86. Defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, acting as agents and on behalf of defendant, City of Philadelphia, caused criminal proceedings to be commenced and continued against plaintiff, Raymond Lerro to accomplish a purpose for which criminal process was not designed.

87. As a direct and proximate result of the actions and omissions of the defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, plaintiff, Raymond Lerro was falsely arrested and falsely imprisoned.

88. The actions and omissions of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, were done purposefully with the intent of committing false arrest and false imprisonment and/or were done in reckless disregard of the probability of causing plaintiff, Raymond Lerro to be falsely arrested and falsely imprisoned and these actions did in fact result in false arrest and false imprisonment, all to plaintiff's great detriment and loss.

**WHEREFORE**, plaintiff, Raymond Lerro demands judgment against defendants, Robert Morrel, Holly Morrel, and Tony Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, jointly and severally, in an amount in excess of two hundred and fifty thousand (\$250,000.00) dollars, plus interest, costs, punitive damages, attorneys' fees and such other and further relief as this Honorable Court deems appropriate.

**COUNT V**  
**PLAINTIFF, RAYMOND LERRO V. DEFENDANTS**  
**INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

89. All the averments contained in preceding paragraphs, inclusive, are incorporated at length herein.

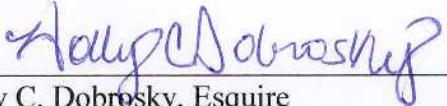
90. As a direct and proximate result of the reckless and intentional conduct of defendants, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, as described above, plaintiff, Raymond Lerro has suffered substantial mental pain and suffering and severe emotional distress and injury.

**WHEREFORE**, plaintiff, Raymond Lerro demands judgment against defendants, Robert Morrel, Holly Morrel, and Tony Belen, Police Officer Charles Squares, Police Officer Andre Hudgens, Police Officer David Richardson, Police Officer Aviles, Detective John Hopkins, Detective Keith Scott, Detective Joseph Murray, Detective

Dennis Rosenbaum, Sergeant Jerome Moore, and City of Philadelphia, jointly and severally, in an amount in excess of two hundred and fifty thousand (\$250,000.00) dollars, plus interest, costs, punitive damages, attorneys' fees and such other and further relief as this Honorable Court deems appropriate.

**LAW OFFICES OF HOLLY C. DOBROSKY**

Dated: December 31, 2015

  
Holly C. Dobrosky, Esquire  
Identification No. 65917  
Attorney for Plaintiff, Raymond Lerro  
100 South Broad Street  
The Land Title Building, Suite 1120  
Philadelphia, PA 19110  
Telephone: 215-880-7871

**JURY TRIAL DEMAND**

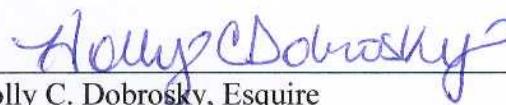
Plaintiff, Raymond Lerro demands a trial by jury as to each count.

**WHEREFORE**, Plaintiff, Raymond Lerro requests the following relief, as to each cause, count and defendant

- a) compensatory damages in excess of \$250,000.00;
- b) punitive damages;
- c) reasonable attorneys fees and costs; and
- d) such further relief as the Court shall deem just and proper.

**LAW OFFICES OF HOLLY C. DOBROSKY**

Dated: December 31, 2015

  
Holly C. Dobrosky, Esquire  
Identification No. 65917  
Attorney for Plaintiff, Raymond Lerro  
100 South Broad Street  
The Land Title Building, Suite 1120  
Philadelphia, PA 19110  
Telephone: 215-880-7871

**VERIFICATION**

I, Raymond Lerro hereby verify that the within pleading is based on information furnished to counsel, which information has been gathered by counsel in the course of this lawsuit. The language of the pleading is that of counsel and not of the undersigned. I verify that the facts set forth in the within pleading are true and correct to the best of my information, knowledge, and belief. To the extent that the contents of the within pleading are that of counsel, verifier has relied upon counsel in making this Verification. This Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Dated: December 30, 2015



Raymond Lerro

A handwritten signature in blue ink, appearing to read "Raymond Lerro". Below the signature, the name "Raymond Lerro" is printed in a smaller, sans-serif font.